

**REMARKS**

Applicant respectfully requests reconsideration of the prior art rejections set forth by the Examiner under 35U.S.C. §§102 and 103. Applicant respectfully submits that the prior art references of record, whether considered alone, or in combination, fail to either teach or suggest Applicant's presently claimed invention.

More specifically, Applicants claimed invention is directed to new and improved systems and methods for generating a three dimensional display of image data. In accordance with the systems and methods described in the instant application, at least one information attribute concerning an object is received and analysis is performed to determine if the at least one information attribute is in contention with one or more geometric attributes of the object. When one information attribute is in contention with one or more geometric attributes, the geometric attributes are modified in order to avoid contention with the information attribute. See specifically, Applicants Summary of the Invention on page 3.

In accordance with an exemplary embodiment described beginning on page 6, paragraph 18, information attributes of a Word 202 may include the size of the characters in the word and there may be other information attributes such as, for example, the characters being capitalized, etc. The geometry attributes of the object may include the Length L of the Box 201. As noted in paragraph 19, the information attributes and the geometric attributes may be in contention, and as a result, may cause inaccurate portrayal of the information

associated with the object. For example, when there is a mismatch between the information attributes of the Word 202 in terms of the size of the characters of the word and the geometric attributes of the object in terms of the Length L, for example. As described in paragraph 20, in accordance with one embodiment, the contention between the information attributes and the geometric attributes can be avoided by modifying the geometry attributes to be consistent with the information attributes.

The claims specify similar characteristics, for example, claim 1 specifies receiving one or more information attributes to be applied to an object and determining if one or more information attributes are in contention with one or more geometric attributes. Claim 1 also requires that when one or more information attributes are in contention with the geometric attributes, the system modifies one or more geometric attributes in order to reduce the contention with the information attributes.

Applicant respectfully submits that neither Putnam (U.S. Patent No. 5,262,965), nor any other reference of record, teaches or suggests this advance in the art. The undersigned has reviewed the Putnam reference, and particularly the portions cited by the Examiner, and has found no disclosure whatsoever regarding the subject matter described in the instant application and set forth in the claims. For example, the Examiner has asserted that Putnam teaches determining if one or more information attributes are in contention at column 18, lines 41-47, and when the attributes are in contention, modifying the attributes (column 20, lines 55-64). However, the referenced portion of column 18 at lines 41-47 merely specifies the organization of the application software consisting of a Database 212 containing

information for computer animation such as models, attributes, key frames, etc. Neither this paragraph nor any of the related paragraphs describe or correspond to identifying contention between information attributes and geometric attributes, and modifying the geometric attributes as specified in each of the independent claims.

Similarly, column 20, lines 55-65, is merely directed to the use of a geometry modifier which applies geometric attributes to each piece of geometry as it comes in and produces rendering parameters. The specification of the Putnam references notes that for the pieces of each object which cannot be discarded, geometric attributes and shading attributes for those pieces are collected, and each piece of the object comprising geometric parameters is then sent to the geometric modifier, and the geometric modifier then applies those geometric attributes to each piece of geometry. There is simply no teaching or suggestion whatsoever regarding identifying contention between information attributes and geometry attributes as specified in the claims. See specifically, the independent claims. Applicant also submits that each of the corresponding dependent claims are similarly allowable over the art of record at least for the reasons that the independent claims are also allowable over the art of record.

Appl. No. 10/059,943  
Amdt. Dated March 24, 2004  
Reply to Office Action of October 24, 2003

Accordingly, in light of the foregoing, Applicant respectfully request the Examiner withdraw these objections and allow all claims in the application.

Respectfully submitted,

Date: 3/24/03

  
Robert J. Depke  
**HOLLAND & KNIGHT LLC**  
131 S. Dearborn, 30<sup>th</sup> Floor  
Chicago, Illinois 60603  
Tel: (312) 263-3600  
**Attorney for Applicant**

(Reg. #37,607)

Appl. No. 10/059,943  
Amdt. Dated March 24, 2004  
Reply to Office Action of October 24, 2003

**CERTIFICATE OF MAILING**

I hereby certify that this correspondence is being deposited with the United States  
Postal Service as First Class Mail on 3/24/03 in an envelope addressed to:

**Mail Stop - Fee Amendment  
Commissioner for Patents  
P.O. Box 1450  
Alexandria, Virginia 22313-1450**

  
\_\_\_\_\_  
Attorney for Applicants